

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

ALONZO MOREFIELD, JR.,
PLAINTIFF,

VS -

KATHY HOLT, INDIVIDUALLY AND IN
OFFICIAL CAPACITY ACTING UNDER COLOR
OF STATE LAW, DEFENDANT.

RECEIVED

* CASE No.: 2:07-CV-080
2007 MAY 23 1 A 9:36

* P. HACKETT
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MOTION FOR PRODUCTION OF EVIDENCE FAVORABLE TO THE
PLAINTIFF AND DISCOVERY

PLAINTIFF, PRO SE, MOVES THIS HONORABLE COURT FOR A ORDER DIRECTING THE ALABAMA ATTORNEY GENERAL ~~THAT HE~~ ~~ON BEHALF OF THE~~ DEFENDANT TO PRODUCE ANY AND ALL EVIDENCE ARGUABLY FAVORABLE TO THE PLAINTIFF THE EXISTENCE OF WHICH IS KNOWN OR BY THE EXERCISE OF DUE DILIGENCE MAY BECOME KNOWN PURSUANT TO RULES 26 THRU 37, FEDERAL RULES CIVIL PROCEDURE, SPECIFICALLY PLAINTIFF REQUESTS THE FOLLOWING:

1. COPIES AND DESCRIPTIONS OF ALL DOCUMENTS AND TANGIBLE THINGS RELEVANT TO THE DISPUTED FACTS ALLEGED WITH PARTICULARS.
2. ANY AND ALL WRITTEN OR RECORDED STATEMENTS MADE BY ANY WITNESS DEFENDANT OR CO-DEFENDANT OR ACCOMPLICE WHICH IS IN THE CUSTODY OF DEFENDANT THE EXISTENCE OF WHICH IS KNOWN BY DEFENDANT.
3. THE SUBSTANCE OF ANY ORAL STATEMENTS MADE BY DEFENDANT, CO-DEFENDANT OR ACCOMPLICE.
4. ANY VIDEOTAPPED OR SURVEILLANCE FOOTAGE RELEVANT TO THIS CASE.
5. ANY AND ALL STATEMENTS BY ANY LAW ENFORCEMENT OFFICIAL OR CLAIMED EXPERT IN CONNECTION WITH THIS CASE.
6. ANY AND ALL RECORDS AND INFORMATION REVEALING FELONY CONVICTIONS ATTRIBUTED TO ANY DEFENDANT OR WITNESS.
7. ANY AND ALL RECORDS OR INFORMATION SHOWING PRIOR MISCONDUCT OR BAD ACTS COMMITTED BY ANY DEFENDANT, WITNESS IN POSSESSION OF ALABAMA DEPT. OF CORRECTIONS OR ANY OTHER LAW ENFORCEMENT OR EMPLOYMENT AGENCY.
8. ANY INFORMATION TENDING TO SHOW THAT OTHER PERSONS WERE INVOLVED OR TOOK PART IN THE FACTS CHARGED IN THIS CASE.
9. ANY INTERNAL DOCUMENTS OR OTHER EVIDENCE INDICATING ANY LAW ENFORCEMENT OR CORRECTIONS OFFICIAL'S MALFEASANCE, MISFEASANCE OR NEGLIGENCE WHETHER BY ACTIONS OF OMISSION OR COMMISSION IN THE PERFORMANCE OF HIS/HER DUTIES CONCERNING THE INSTANT CASE.

10. A LIST OF NAMES, ADDRESSES, DATE OF BIRTH, AND SOCIAL SECURITY NUMBERS OF Defendant AND ALL WITNESSES KNOWN TO Defendant having INFORMATION exculpatory to the PLAINTIFF.
11. ANY AND ALL EVIDENCE WHICH IS EXCULPATORY OF THE PLAINTIFF WHICH DEFENDANT IS AWARE OR BECOMES AWARE.

Wherefore PLAINTIFF respectfully REQUESTS THIS COURT ENTER AN ORDER REQUIRING THE DEFENDANT TO PRODUCE THE AFOREMENTIONED INFORMATION AS SOON AS POSSIBLE.




ALONZO MOREFIELD, JR.
PLAINTIFF, PRO SE

CERTIFICATE OF SERVICE

THIS WILL CERTIFY THAT I HAVE FILED THE ORIGINAL AND FOREGOING DOCUMENTS IN THIS COURT WITH COPIES TO BE SERVED UPON ALABAMA ATTORNEY GENERAL TROY KING BY PLACING THE SAME IN U.S. MAIL THROUGH FORWARDING VIA CLARK, U.S. DISTRICT COURT THIS 21ST DAY OF MAY, 2007.

ALABAMA ATTORNEY GENERAL TROY KING THRU
TARA S. KNEE, GENERAL COUNSEL
ALABAMA DEPARTMENT OF CORRECTIONS
PO BOX 301501
MONTGOMERY, AL. 36130



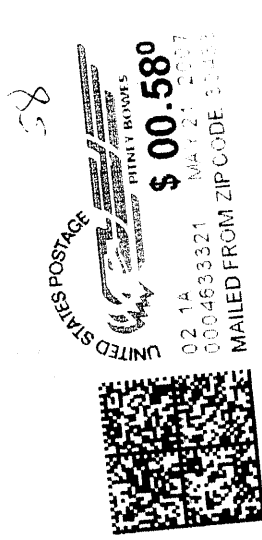
ALONZO MOREFIELD, JR.
PLAINTIFF, PRO SE

GEORGIA DEPT. OF CORRECTIONS
40 GEORGIA STATE PRISON
I.D. NO. 429955
300 FIRST AVENUE
REIDSVILLE, GA. 30453

Alonzo Morefield, Sr.
479855, 2164 Hwy 147
Reidsville, GA 30499

LEGAL MAIL

LETTER SENT TO MAILBOX
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Debra P. Hackers, Clerk.
U.S. District Court, Middle District of Alabama
P.O. Box 711
Montgomery, AL 36101-0711

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